

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATIONS OF CIMAREX ENERGY CO.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

Case Nos. 20283 and 20284

**APPLICATION OF EOG RESOURCES, INC.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

Case Nos. 20422 and 20423

**APPLICATION OF EOG RESOURCES, INC.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

Case Nos. 20476-20479

CONSOLIDATED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Cimarex Energy Co. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Cimarex Energy Co.
Suite 600
600 North Marienfeld
Midland, Texas 79701

Attention: Cody Elliott
(432) 571-7873

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

EOG Resources, Inc.

OPPONENT'S ATTORNEY

Michael H. Feldewert

STATEMENT OF THE CASE

APPLICANT

Case No. 20283: Cimarex Energy Co. seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 11, Township 25 South, Range 32 East, NMPM. The unit will be dedicated to the Denali 11 Fed. Com. Well No. 1H, with a first take point in the SW/4SW/4 and a final take point in the NW/4NW/4 of Section 11. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

Case No. 20284: Cimarex Energy Co. seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 11, Township 25 South, Range 32 East, NMPM. The unit will be dedicated to the Denali 11 Fed. Com. Well No. 33H, with a first take point in the SE/4SW/4 and a final take point in the NE/4NW/4 of Section 11. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

In Case Nos. 20422 and 20423 EOG Resources, Inc. seeks to pool the Bone Spring formation in the W/2 of Section 13 and the NW/4 of Section 24. In Case Nos. 20476-20479 EOG Resources, Inc. seeks to pool the Bone Spring formation in Sections 11 and 14

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Cody Elliott (landman)	20 min.	Approx. 8
Lauren Copley (geologist)	20 min.	Approx. 4
Eddie Behm (engineer)	20 min.	Approx. 4

OPPONENT

WITNESSES

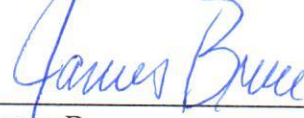
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

The two operators have competing development plans in this area, so the cases should be consolidated for hearing.

Respectfully submitted,



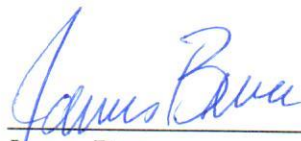
James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Cimarex Energy Co.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 9th day of May, 2019 by e-mail:

Michael Feldewert
Adam Rankin
Holland & Hart LLP
P.O. Box 2208
Santa Fe, New Mexico 87504



James Bruce